

**UNITED STATES DISTRICT COURT**

**Western District of Virginia**

**Tiffany Verleigha Poindexter,**

Plaintiff,

**V.**

**EXPERIAN**

Defendant.

**Civil Action no.:** [To be assigned]

*U: 25CV52*

CLERK'S OFFICE U.S. DISTRICT COURT  
AT LYNCHBURG, VA  
FILED

JUL 02 2025

LAURA A. AUSTIN, CLERK  
BY: *[Signature]*  
DEPUTY CLERK

**COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF**

**JURY TRIAL DEMANDED**

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**INTRODUCTION**

1. Plaintiff brings this action against Experian, a consumer reporting agency, for violations of the Fair Credit Reporting Act ("FCRA"), 15 U.S.C. § 1681 et seq., arising out of Defendant's willful and/or negligent reporting of inaccurate information on Plaintiff's credit file, failure to conduct reasonable investigations upon dispute, and failure

to maintain reasonable procedures to ensure maximum possible accuracy of information reported.

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## **JURISDICTION AND VENUE**

2. This Court has subject matter jurisdiction under 28 U.S.C. § 1331 and 15 U.S.C. § 1681p, which provides for jurisdiction of claims brought under the FCRA.

3. Venue is proper in this District under 28 U.S.C. § 1391(b), because the Defendant regularly conducts business in this District, and a substantial part of the events giving rise to the claims occurred in this District.

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## **PARTIES**

4. Plaintiff, Tiffany V Poindexter, is a natural person and consumer within the meaning of the FCRA, 15 U.S.C. § 1681a(c), residing at 105 Chambers Street, Lynchburg, VA 24501.

5. Defendant, Experian, is a company with its principal place of business at 475 Anton Blvd., Costa Mesa, CA 92626. Experian is a "consumer reporting agency" as defined by 15 U.S.C. § 1681a(f).

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## **FACTUAL ALLEGATIONS**

6. On or about March 4, 2025, Plaintiff obtained a copy of her consumer credit report prepared by Experian.

7. Upon review, Plaintiff discovered that Experian was reporting inaccurate and

materially misleading information concerning one or more tradelines. Specifically, the credit report showed :

**A. DPT ED/AIDV I Account # 99949832341E0082\*\*\*\*\***

( Plaintiff spoke with Monica, a representative of the creditor by phone, who confirmed the correct account information orally on April 13, 2025 )

- Account Number is inaccurate, the correct account number is 994983234-1-08.
- Account Type is inaccurate, creditor was unable to verify.
- Date opened is inaccurate, the creditor verified the date the account was opened is 05/21/2013.
- Number of months is reporting inaccurate, the creditor verified the loan was for 168 months.
- Balance is reporting inaccurate, creditor verified balance is \$9780.09.
- High Credit limit is reporting inaccurate, creditor verified that there is no high credit amount.
- Credit Limit is inaccurate, creditor was unable to verify.
- Comments are inaccurate. Experian was notified that this should not be reporting anything and is to remain blank or read “ Paid In Full”
- Date Last Active is reporting inaccurate, creditor was unable to verify.
- Date of Last Payment is inaccurate, creditor verified last report of payment was 09/15/2015.
- Two Year Payment History is inaccurate, the creditor verified the last payment was 09/15/2015.

**B. DPT ED/AIDV I Account # 99949832341E0072\*\*\*\*\***

( Plaintiff spoke with Monica, a representative of the creditor by phone, who confirmed the correct account information orally on April 13, 2025 )

- Account Number is reporting inaccurate, the correct account number is 994983234-1-07.
- Account Type is inaccurate, creditor was unable to verify.
- Date opened is reporting inaccurate, creditor verified date the account was opened is 05/21/2013.
- Number of months is reporting inaccurate, the creditor verified the loan was for 134 months.
- Balance is reporting inaccurate, creditor verified balance is \$4087.70.
- High Credit limit is reporting inaccurate, creditor verified that there is no high credit amount.
- Credit Limit is inaccurate, creditor was unable to verify.
- Comments are inaccurate. Experian was notified that this should not be reporting anything and is to remain blank or read "Paid In Full"
- Date Last Active is reporting inaccurate, creditor was unable to verify.
- Date of Last Payment is reporting inaccurate, the creditor verified the last report of payment was 09/15/2015.
- Two Year Payment History is inaccurate, the creditor verified the last payment was 09/15/2015.

**C. DPT ED/AIDV I Account # 99949832341E0102\*\*\*\***

( Plaintiff spoke with Monica, a representative of the creditor by phone, who confirmed the correct account information orally on April 13, 2025 )

- Account Number is inaccurate, the correct account number is 994983234-1-10.
- Account Type is inaccurate, creditor was unable to verify.
- Date opened is reporting inaccurate, creditor verified date the account was opened is 06/26/2014.
- Balance is reporting inaccurate, creditor verified balance as \$7,853.77.



- Number of months the reporting is inaccurate, the creditor verified the loan was for 148 months.
- High Credit limit is reporting inaccurate, creditor verified there is no high credit amount.
- Credit Limit is inaccurate, creditor was unable to verify.
- Comments are inaccurate. Experian was notified that this should not be reporting anything and is to remain blank or read " Paid In Full"
- Date Last Active is reporting inaccurate, creditor was unable to verify.
- Date of Last Payment is reporting inaccurate, the creditor verified there is no record of a payment made for this loan.
- Two Year Payment History is inaccurate, the creditor verified there has not been a payment made for this loan.

**D. DPT ED/AIDV I Account # 99949832341E0092\*\*\*\***

( Plaintiff spoke with Monica, a representative of the creditor by phone, who confirmed the correct account information orally on April 13, 2025 )

- Account Number is reporting inaccurate, the correct account number is 994983234-1-09.
- Account Type is inaccurate, creditor was unable to verify.
- Date Opened is reporting inaccurate, creditor verified date the account was opened was 06/26/2014.
- Balance is reporting inaccurate, creditor verified balance is \$4171.91.
- Number of months the reporting is inaccurate, creditor verified months of loan is 134 months.
- High Credit Limit is reporting inaccurate, creditor verified there is no high credit limit.
- Credit Limit is inaccurate, the creditor was unable to verify.

- Comments are inaccurate. Experian was notified that this should not be reporting anything and is to remain blank or read “ Paid In Full”
- Date Last Active is reporting inaccurate, creditor unable to verify.
- Date of Last Payment is inaccurate, the creditor verified there is no record of a payment made for this loan.
- Two Year Payment History is inaccurate, the creditor verified there has not been a payment made for this loan.

**E. DPT ED/AIDV I Account # 99949832341E0112\*\*\*\***

( Plaintiff spoke with Monica, a representative of the creditor by phone, who confirmed the correct account information orally on or about April 13, 2025 )

- Account Number is reporting inaccurate, the correct account number is 994983234-1-11.
- Account Type is inaccurate, creditor was unable to verify.
- Date opened is inaccurate, the creditor verified the date the account was opened was 09/10/2015.
- Balance is reporting inaccurate, creditor verified balance is \$ 4060.21.
- Number of months is inaccurate, the creditor verified number of months is 135 months.
- High credit limit is reporting inaccurate, creditor verified there is no high credit amount.
- Credit Limit is inaccurate, creditor was unable to verify.
- Comments are inaccurate. Experian was notified that this should not be reporting anything and is to remain blank or read “ Paid In Full”
- Date Last Active is reporting inaccurate, creditor was not able to verify.
- Date of Last Payment is inaccurate, the creditor verified there is no record of a payment made for this loan.

- Two Year Payment History is inaccurate, the creditor verified there has not been a payment made for this loan.

**F. DPT ED/AIDV I Account # 99949832341E0122\*\*\*\***

(Plaintiff spoke with Monica, a representative of the creditor by phone, who confirmed the correct account information orally on or about April 13, 2025)

- Account Number is reporting inaccurate, the correct account number is 994983234-1-12.
- Account Type is inaccurate, creditor was unable to verify.
- Date opened is inaccurate, the creditor verified the date the account was opened was 09/10/2015.
- Balance is reporting inaccurate, creditor verified balance is \$ 7072.62.
- Number of months is reporting inaccurate, the creditor verified the number of months is 150 months.
- High credit limit is reporting inaccurate, creditor verified there is no high credit amount.
- Credit Limit is inaccurate, creditor was unable to verify.
- Comments are inaccurate. Experian was notified that this should not be reporting anything and is to remain blank or read "Paid In Full"
- Date Last Active is reporting inaccurate, creditor was not able to verify.
- Date of Last Payment is inaccurate, the creditor verified there has not been a payment made for this loan.
- Two Year Payment History is inaccurate, the creditor verified there has not been a payment made for this loan.

**G. MONEYLION I Account # LLI4289\*\*\*\***



( Plaintiff spoke with Lilyan, a representative of the creditor by phone, who confirmed the correct account information orally on or about April 13, 2025)

- Account Number is reporting inaccurate, the creditor was unable to verify.
- Account Type is inaccurate, the creditor was unable to verify.
- Date opened is inaccurate, the creditor verified the date the account was opened was 08/27/2019.
- Monthly Payment is inaccurate, verified monthly payment was \$40.00.
- Balance is reporting inaccurate, the creditor was unable to verify.
- High Credit limit is reporting inaccurate, the creditor verified there is no High Credit Limit.
- Credit Limit is inaccurate, the creditor verified the credit limit was \$500.00
- Payment status is inaccurate, the creditor verified the account is closed.
- Date last reported is inaccurate, the creditor was unable to verify.
- Date Last Active is reporting inaccurate, creditor was unable to verify.

**H. MONEYLION I Account # LLI4306\*\*\*\***

( Plaintiff spoke with Lilyan, a representative of the creditor by phone, who confirmed the correct account information orally on or about April 13, 2025)

- Account Number is reporting inaccurate, the creditor was unable to verify.
- Account Type is inaccurate, the creditor was unable to verify.
- Date opened is inaccurate, the creditor verified the date the account was opened was 12/19/2019.
- Monthly Payment is inaccurate, verified monthly payment was \$40.00.
- Balance is reporting inaccurate, the creditor was unable to verify.
- High credit limit is reporting inaccurate, the creditor verified there is no High Credit Limit.
- Credit Limit is inaccurate, the creditor verified the credit limit was \$500.00



- Payment status is inaccurate, the creditor verified the account is closed.
- Date last reported is inaccurate, the creditor was unable to verify.
- Date Last Active is reporting inaccurate, creditor was unable to verify.

8. The information reported by Experian was false, incomplete, and/or materially misleading and did not accurately reflect Plaintiff's credit history.

9. Plaintiff immediately submitted a written dispute to Experian under 15 U.S.C. subsection 1681i, enclosing documentation that supported the inaccuracy and requesting reinvestigation and correction of the disputed item(s).

10. Despite receiving sufficient notice and evidence, Experian failed to conduct a reasonable reinvestigation and continued to report the inaccurate information.

11. Experian failed to provide Plaintiff with the results of its reinvestigation within 30 days, as required by 15 U.S.C. subsection 1681i(a)(6).

12. As a result of Experian's actions and omissions, Plaintiff has suffered actual damages including but not limited to: credit denials, higher interest rates, emotional stress, loss of credit opportunity, and reputational harm.

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## **CLAIMS FOR RELIEF**

### **COUNT I – VIOLATION OF THE FCRA (15 U.S.C. § 1681e(b))**

(Failure to Follow Reasonable Procedures to Ensure Accuracy)

13. Plaintiff incorporates all preceding paragraphs as if fully set forth herein.

14. Experian failed to follow reasonable procedures to assure maximum possible accuracy of the information in Plaintiff's credit report.

15. As a result, Experian published false and inaccurate credit information about Plaintiff.

16. Experian's violation was willful, entitling Plaintiff to statutory and punitive damages

under 15 U.S.C. § 1681n. In the alternative, Experian was negligent, entitling Plaintiff to actual damages under 15 U.S.C. § 1681o.

**COUNT II – VIOLATION OF THE FCRA (15 U.S.C. § 1681i)**

(Failure to Conduct a Reasonable Reinvestigation)

17. Plaintiff incorporates all preceding paragraphs as if fully set forth herein.
18. Experian failed to conduct a reasonable reinvestigation after Plaintiff submitted a dispute regarding inaccurate information on the credit report.
19. Experian failed to review all relevant information provided by Plaintiff, and/or failed to correct or delete the disputed information.
20. Experian's failure to properly reinvestigate the disputed items resulted in continued publication of false information.
21. These actions were willful or, in the alternative, negligent, entitling Plaintiff to statutory and/or actual damages.

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**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully moves this Honorable Court to enter judgment in Plaintiff's favor and against Defendant as follows:

- A. Award Plaintiff actual damages in an amount to be determined at trial;
  - B. Award Plaintiff statutory damages of \$1,000 pursuant to 15 U.S.C. § 1681n(a);
  - C. Award Plaintiff punitive damages pursuant to 15 U.S.C. § 1681n(a)(2);
  - D. Award Plaintiff costs and reasonable attorney's fees pursuant to 15 U.S.C. § 1681n and/or § 1681o;
  - E. Issue injunctive relief ordering Experian to correct the inaccurate entries and cease reporting them;
  - F. Grant such other and further relief as the Court deems just and proper.
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## **DEMAND FOR JURY TRIAL**

Plaintiff demands a trial by jury on all issues so triable.

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**Respectfully submitted,**

A handwritten signature in cursive script that reads "Tiffany Verleigha Poindexter © Pro Se".

**Tiffany Verleigha Poindexter**

**105 Chambers Street**

**Lynchburg, Virginia 24501**

**(434)-583-8429**

**[t.vpoindexter@gmail.com](mailto:t.vpoindexter@gmail.com)**

**Plaintiff, Pro Se**